

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 03cr10370-DPW
)	
JOSE VEZGA)	

DEFENDANTS' JOINT, ASSENTED-TO REQUEST FOR ADDITIONAL TIME
TO FILE MOTIONS

_____Page Kelley, counsel for Jose Vezga, joined by William Crowe, counsel for co-defendant John Graham, and Debra DelVecchio, counsel for co-defendant Gary Newell, respectfully requests additional time to file motions. The Court, in an order dated April 5, 2004, set Wednesday, June 16, 2004 for the filing of any non-discovery type motions; counsel jointly request that the Court set a new deadline at the status conference scheduled for Thursday, June 17.

Counsel so request because this is a complex case charging a drug distribution conspiracy with eight named co-defendants. To date counsel have received 4,961 pages of discovery. There are numerous search warrants - for dwellings, storage areas, cars, and voice mailboxes - associated with the case, and numerous court-authorized interceptions of wire, electronic and/or oral communications. Counsel require additional time to read and evaluate these materials.

In addition, counsel have not been able to obtain copies of all of the numerous audiotapes, videotapes, and disks associated with the case. Page Kelley, counsel for Jose Vezga, first requested copies of these materials from Apex, the company that is supposed to provide these materials to defense counsel, in February, 2003. After many problems acquiring a complete set of these materials from Apex, counsel finally sent a letter to Assistant United States

Attorney Rachel Hershfang in June, formally requesting the materials. Counsel anticipate resolving these problems and receiving the missing materials shortly, but will need additional time to review the materials prior to filing motions.

Assistant United States Attorney Rachel Hershfang has no objection to this motion.

JOHN GRAHAM
By his attorney,

/s/ William Crowe

William Crowe
BBO 106960
Crowe & Dunn, LLP
141 Tremont Street
Boston 02111

JOSE VEZGA
By his attorney,

/s/ Page Kelley

Page Kelley
B.B.O. #548237
Federal Defender Office
408 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Tel: 617-223-8061

GARY NEWELL
By his attorney,

/s/ Debra DelVecchio

Debra DelVecchio
DelVecchio & Houseman
The Perry Building
15 Front Street
Salem, MA 01970